

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

DOLORES SAMUEL, individually and on §
behalf of the estate of JULIUS PAYE §
KEHYEI, DECEDENT, KYLE SAMUEL §
and MAYA THORN as NEXT FRIEND OF §
MINOR, S.T., §
Plaintiffs, § CIVIL ACTION NO. 4:22-cv-2900
V. §
CITY OF HOUSTON, TEXAS, K. DREY, §
Individually, and JOHN DOE HPD §
OFFICERS 1-10, §
Defendants. §

PLAINTIFFS’ AMENDED OBJECTIONS TO
DEFENDANTS’ TRIAL EXHIBIT LIST

Pursuant to the Court’s First Amended Scheduling/Docket Control Order dated August 19, 2024 (Dkt. No 60), Plaintiffs Dolores Samuel, individually, and Maya Thorn as Next Friend of S.T., the minor daughter of Julius Paye Kehyei and on behalf of the Estate of Julius Paye Kehyei, (“Kehyei”) deceased hereby files their amended objections to Defendants’ Exhibit List (Doc. No. 79).

I.

OBJECTIONS TO DEFENDANTS’ TRIAL EXHIBITS

DEFENDANTS EXHIBIT NO.	DESCRIPTION/BATES NO.	PLAINTIFF’S OBJECTIONS	RULING
1.	HPD Offense Reports BS #000001-000208	Hearsay Hearsay within Hearsay Confusing Misleading Prejudice	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled <input type="checkbox"/> Modified

DEFENDANTS EXHIBIT NO.	DESCRIPTION/BATES NO.	PLAINTIFF'S OBJECTIONS	RULING
2.	Houston Forensic Science Lab Reports, BS#000209-000255	Hearsay; Confusing Misleading Prejudice Prejudice FRE 701 FRE 702 FRE 703	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled <input type="checkbox"/> Modified
3.	Crime Scene Photos of Revolver, BS#000256-000258	Hearsay; Confusing Misleading Prejudice Crime Scene Photos not produced despite multiple requests 26(a)(3)(c)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled <input type="checkbox"/> Modified
4.	Officer Kyle Drey T Cole Records BS #000977-000993	Hearsay; FRE 402 FRE 403	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled <input type="checkbox"/> Modified
5.	Officer Kyle Drey Training Records, BS #000994-001007	Hearsay; Not relevant FRE 402 FRE 403	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled <input type="checkbox"/> Modified
6.	Houston Forensic Science DNA Lab Report, BS#002804-002807	Hearsay; Confusing Misleading Prejudice FRE 701 FRE 702 FRE 703	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled <input type="checkbox"/> Modified
7.	Officer Rincones Statement, BS #000339-000340	Hearsay; Confusing Misleading Prejudice	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled <input type="checkbox"/> Modified
8.	Officer Kyle Drey Statement, BS #000341-000343	Hearsay; Confusing Misleading Prejudice	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled <input type="checkbox"/> Modified

DEFENDANTS EXHIBIT NO.	DESCRIPTION/BATES NO.	PLAINTIFF'S OBJECTIONS	RULING
9.	Officer Steven Hamala Statement, BS #000337-000339	Hearsay Confusing Misleading Prejudice	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled <input type="checkbox"/> Modified
10.	Houston Special Investigation Unit File, BS #001487- 001872	Hearsay Confusing Misleading Prejudice	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled <input type="checkbox"/> Modified
11.	HPD General Orders, BS #002358-002422		<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled <input type="checkbox"/> Modified
12.	Officer Ballard BWC BS#001475	Hearsay Confusing Misleading Prejudice	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled <input type="checkbox"/> Modified
13.	Officer Rincones BWC BS#001478	Hearsay Confusing Misleading Prejudice	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled <input type="checkbox"/> Modified
14.	Officer Dexter BWC BS#001479	Hearsay Confusing Misleading Prejudice	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled <input type="checkbox"/> Modified
15.	Officer Evans BWC BS #001476	Hearsay; Confusing Misleading Prejudice	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled <input type="checkbox"/> Modified
16.	Officer Garza BWC BS#001477	Hearsay; Confusing Misleading Prejudice	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled <input type="checkbox"/> Modified
17.	Officer Holland BWC BS#001483	Hearsay; Confusing Misleading Prejudice	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled <input type="checkbox"/> Modified
18.	Officer Jesse Seay BWC BS#001484	Hearsay; Confusing Misleading Prejudice	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled <input type="checkbox"/> Modified

DEFENDANTS EXHIBIT NO.	DESCRIPTION/BATES NO.	PLAINTIFF'S OBJECTIONS	RULING
19.	Officer Hudeck BWC BS#1480	Hearsay; Confusing Misleading Prejudice	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled <input type="checkbox"/> Modified
20.	Officer Garrett BWC BS#1481	Hearsay; Confusing Misleading Prejudice	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled <input type="checkbox"/> Modified
21.	Officer Sutton BWC BS#1482	Hearsay; Confusing Misleading Prejudice	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled <input type="checkbox"/> Modified
22.	Officer Giles BWC BS#1474	Hearsay; Confusing Misleading Prejudice	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled <input type="checkbox"/> Modified
23.	HPOU Meet and Confer	Hearsay; FRE 402 FRE 403	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled <input type="checkbox"/> Modified

Respectfully submitted,

By: /s/ Daryl K. Washington
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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on, the foregoing pleading was filed on August 8, 2025, with the clerk of The Court for the U.S. District Court, Southern District of Texas, using the electronic case filing system of The Court. The electronic case filing system sent a “Notice of Electronic Filing” to all attorneys of record who have consented in writing to accept this Notice as service of documents by electronic means.

/s/Daryl K. Washington
DARYL K. WASHINGTON